

EXHIBIT B

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

Michael McCarthy, et al.,)	
)	
Plaintiffs)	
)	
)	
v.)	Civil Action No.: 4:20-cv-10701-DPW
)	
)	
Charles D. Baker, in his Official Capacity)	
as Governor of the Commonwealth of)	
Massachusetts, et al.,)	
)	
Defendants)	
)	
)	
Cedrone, LLC d/b/a Shawsheen Firearms,)	
et al.,)	
)	
Plaintiffs)	
)	
)	
v.)	Civil Action No.: 4:20-cv-40041-DPW
)	
)	
Charles Duane Baker, in his Capacity as)	
Governor of the Commonwealth of)	
Massachusetts, et al.,)	
)	
Defendants)	

Affidavit of Steven Hathaway

1. I am the President and CEO of Mass Firearms School, Inc.
2. Mass Firearms School, Inc., is a shooting sports center in Holliston, Massachusetts.
3. Neither myself nor the Mass Firearms School are parties in the above named suits.
4. This affidavit is being provided to provide information for the Court.
5. Mass Firearms School operates two indoor shooting ranges.

6. These ranges are used by the public for recreational shooting as well as firearms training / education.
7. These shooting ranges provide an effective social distancing environment by separating each shooting lane with solid partitions.
8. These partitions are designed to effectively separate participants, ensuring no direct contact.
9. As a result, each individual remains at least six feet apart.
10. Mass Firearms School uses a Purge Ventilation System for air management in its' ranges.
11. A purge system draws air from the atmosphere, introduces it into the range, filters the air, and then releases cleaned air back into the atmosphere.
12. As a result our range ventilation system is continually pushing fresh air past the shooters, drawing any particulates down range.
13. This results in the heavy particles from discharging a firearm being carried away from the shooter.
14. As such, particles as small as viruses would not have the opportunity to linger near a shooter.
15. Should Mass Firearms School be allowed to reopen, proper social distancing would occur.
16. Mass Firearms School would adhere to all health, safety and social distancing guidelines should it be allowed to reopen.

Signed under the pains and penalties of perjury this 13th day of May, 2020.



Steven Hathaway





